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September 27, 2021

Hon. Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

**Re: *El Bey v. Crocillo et. al.*
*SDNY Civil Docket No.: 20-cv-524-MKV***

Dear Judge Vyskocil:

I represent MTA Police Officers Leyland Crocilla and Douglas Michels, as well as MTA Police Lieutenant Joseph Cona and MTA Police Sergeant Vasilios Vollas in this action. I write to request an extension of time to respond to the Second Amended Complaint and to request a conference to address that response.

While the complaint sounds in *inter alia*, excessive force pursuant to 42 USC §1983, several specific allegations in the complaint are illegible. Moreover, paragraph III (Statement of Claim) makes reference to attached paperwork of almost three hundred pages. I am loath to request leave to file a FRCP Rule 8 motion at this time, and suggest that Plaintiff be instructed to file a third amended complaint with numbered paragraphs and without enclosures so that I may respond to it.

I previously requested an extension of time to respond to Plaintiff's Amended Complaint, which was granted together with Plaintiff being granted leave to file the instant Second Amended Complaint.

Respectfully submitted,



Andrew K. Preston

CC: Counsel (by ECF)

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